

Exhibit 2-E

Paz Discovery

*COURTNEY LINDE, et al. VS.
ARAB BANK, PLC*

*ILAN PAZ
April 19, 2012*



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meeting I'm talking about right now took place

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when he was no longer serving in this -- in

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this capacity.

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Q. Do you know whether he was a paid

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consultant to Arab Bank at the time when you

7

had your meeting concerning your involvement in

8

this case?

9

A. I don't know at all -- I don't know

10

when he started providing services to the Arab

11

Bank, if at all. I think if he did, it was in

12

the earlier period, but I don't know whether he

13

provides services to the Arab Bank -- whether

14

he was providing services to the Arab Bank when

15

I met with him. That, I don't know.

16

Q. Did there ever come a time when you

17

became aware that Mr. Dekel was being

18

compensated by Arab Bank?

19

A. I don't know whether he's being

20

compensated. I know that he was involved. I

21

don't get into the financial area because I

22

don't know. But even if he was compensated,

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it's not -- it's not a crime.

24

Q. Other than Mr. Ialone (phonetic)

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and Mr. Dekel, did you have a similar

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was.

Q. Returning to Exhibit 1 for a moment, the letter from Mr. Walsh, on page four in the first full paragraph in the middle it reads that "In addition, Brigadier General Paz will testify -- Brigadier General Paz will testify that the IDF was familiar with the operations of the West Bank charitable organizations and Zakat committees at issue in these actions, that it had the power to close these organizations if it found that any were involved in the support of terrorism or served the terrorist purposes of Hamas and that he did not do so, nor did he contemplate doing so."

MR. OSEN: That's the end of the quote if you could translate that for the witness.

Q. Do you plan to so testify?

A. Yes.

Q. Can you please list for me the charitable organizations and Zakat committees that are at issue in this litigation?

A. No. I can't do it. I'd like to stress that I am not an expert on charitable

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organizations. I'm not an intelligence person.
I'm a commander who receives briefings on
existing intelligence information and acts
accordingly.

Q. But how can you testify that the
IDF was familiar with the operations of the
West Bank charitable organizations and Zakat
committees at issue in this litigation if you
don't know which ones are at issue in this
litigation?

A. The Civil Administration under my
command for most of the time period was
responsible for watching or surveilling the
charitable organizations that were -- that
there were operating in the West Bank. This
job was imposed naturally on the division
for --

(In English) Branch.

(Interpreted) -- For the branch of
Arab affairs. And they carried out this
surveillance or this observation and I received
reports sometimes on a daily basis, but at
least on a weekly basis. Some of the reasons
for the surveillance that was carried out by

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1 PAZ

2 Mr. Werbner to strike that answer, but
3 we'll proceed.

4 Q. Let's turn back again to the
5 operation against accounts held in various
6 branches of Arab Bank in 2004 in Ramallah.

7 A. "Operations" you said?

8 Q. Operations, plural, because there
9 were multiple branches involved but you can --

10 A. He's right. One operation at two
11 banks.

12 Q. Two banks and multiple branches,
13 but for purposes of my question, I just want to
14 refer to the matter as a whole.

15 A. To the best of my recollection it
16 was two branches, but it's really immaterial.

17 Q. Okay. You mentioned that you
18 attended one meeting concerning this operation;
19 is that correct?

20 A. With respect to a meeting with many
21 people present, I participated in one such
22 meeting. I was involved in the participation
23 of my people in such operations several times
24 prior to that.

25 Q. Okay. Let's take the big meeting

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that you just referred to. What can you tell us your -- of your personal recollection of that meeting?

A. I decided to participate in that meeting, which took place in the offices of Ofer Dekel who was already serving in his position as deputy head of the Israel security services and he coordinated all of the preparations in anticipation of that operation.

That was led by the Israel security services of course. I had become aware of the operations several weeks prior to that. I was asked to approve the participation of my people into realms and because this was not a routine type of operation, not something that we're engaged in on a daily basis, generally because of the fact that we were dealing with money here, an international institution, which was headquartered in a neighboring country with which we had peaceful relations.

A large peaceful organization which yielded great influence throughout the territories. I had a number of issues that I wanted to hear about and to ensure that they

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were well-planned or at least that they were being taken into account with respect to the operations that preceded the operations and followed the operations.

And, therefore, I decided to participate. In my opinion, it was sort of a summary meeting finalizing things prior to the operation a day or two before the operation took place. I participated in that meeting. To the best of my recollection, most of the issues that I made a note to myself that I should check had been resolved as far as I was concerned or the -- or the planning took them into account in a manner that was satisfactory to me.

Upon the completion of the meeting, I stayed and had a one-on-one meeting with Ofer Dekel. It's possible that his assistant was also present. I do not recall. Generally he also takes part and I asked him two questions. The first question was whether the operation was directed against the bank or against the specific individuals who were account holders there.

1 PAZ

2 And the second question was whether
3 that operation had been examined from a legal
4 standpoint. With respect to the -- with
5 respect to the second question, I was told that
6 it was totally obvious, however; that it was
7 not a question that needed to be asked by
8 commanders in the military.

9 And with respect to the first
10 question, I was told that the operation was
11 intended for the purpose of the confiscation of
12 funds belonging to specific individuals that
13 are involved in terrorism and not against the
14 bank, and, therefore, it was planned so that
15 the bank could continue its activity
16 immediately upon the conclusion of the
17 operation.

18 That's what took place in the
19 meeting and immediately thereafter. I did not
20 take part in the operation itself. However, I
21 received a report from my people who did
22 participate in it, subsequent to its
23 conclusion, the next morning. That's it.

24 MR. OSEN: We'll take our break for
25 lunch and pick this up afterwards.